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August 22, 1996

96-RM-WM-00120-KH

 John Hill, Vice President Kaiser-Hill Company Building 111 Rocky Flats Environmental Technology Site P.O. Box 464 Golden, Colorado 80402-0464

WASTE MANAGEMENT INVENTORY PLAN - JLM-148-96

Enclosed for your review is the Rocky Mountain Remediation Services (RMRS) Waste Management Inventory Plan. This plan outlines the project path forward for RMRS Waste Management Operations at the Rocky Flats Environmental Technology Site (Site) considering a two year planning horizon. Specifically, the plan describes the scope, goals, and primary objectives of RMRS Waste Management Operations. An integral part of this plan is the systematic evaluation and proposed utilization of existing facilities at the Site. Thus, this plan will address both the required activities and facilities to manage waste at the Site for next two years and support site closure.

It is our intention to publish this plan as a summary level planning document. It is hoped that this document will form the basis for supporting the WAD managers in optimizing the waste management project's contribution to prompt site closure and the Ten-Year Plan.

This plan lays out the requirements for all waste container movements for the remainder of fiscal year 1996 (FY-96). The plan will be updated quarterly to reflect a two year planning horizon, utilizing snapshots at six month intervals. This allows the plan to be flexible to account for the changing conditions at the Site. The details for each container move are not part of this submittal due to our efforts to keep the plan at a summary level.

The primary goal of Waste Management Operations is to dispose of waste in a cost effective and efficient manner. This includes both the backlog and newly generated waste. To accomplish this goal, an integrated approach needs to be implemented that encompasses residue stabilization projects, decommissioning projects, waste storage capacities, and waste disposal options.

The four basic objectives of this plan are: 1) remove all of the waste storage areas out of the protected area, 2) dispose of as much waste as possible, 3) identify additional waste storage capacity, and 4) establish "bonded" waste storage areas for those wastes that cannot be disposed of. These objectives are detailed below.

By removing all of the waste storage areas from the protected area, RMRS will reduce the Site mortgage and free-up buildings/areas for residue stabilization activities and the continued decommissioning of the Site. As you know, a significant amount of resources are expended to monitor waste storage in Material Access Areas and buildings associated with plutonium stabilization. By establishing waste storage areas outside the protected area, many of the security and safeguards requirements are eliminated, thus reducing the overall cost associated with storing waste.

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J. A. Hill JLM-148-96 August 22, 1996 Page 2

Due to the limited amount of waste storage at the Site and the need to support both the residue stabilization projects and decommissioning activities, waste disposal becomes the preferred option for those wastes that can be disposed. Those wastes that cannot be disposed of require objective number three; waste storage.

There are three options for waste storage: 1) continue to utilize existing waste storage areas in diverse facilities at the Site, 2) identify new/additional waste storage in existing facilities at the Site, and/or, 3) build new waste storage facilities. The plan will address each of these options, most probably utilizing a combination of two or all three.

Once waste storage areas are established, the concept of "bonded" waste storage will be implemented. Bonded storage refers to the storage of waste containers in a condition that meets the disposal site's waste acceptance criteria. As of today, many of the wastes in storage could not be shipped off for disposal due to non-conformances with applicable waste acceptance criteria. In addition, waste of one type is intermingled with waste of another type, e.g., TRU is co-located with LLW. Consolidation of certified waste into bonded areas alleviates this problem while reducing management oversight, operational costs, and personnel exposure from waste handling.

RMRS intends to utilize this planning tool as a means to identify which projects are necessary for waste management at RFETS. For example, these projects may involve establishing new waste storage facilities, permit modifications to existing storage facilities, establishing new waste disposal contracts, and/or developing new treatment technologies for waste disposal. In addition, this tool will allow Waste Management the opportunity to forecast the impacts of waste generation activities on existing storage and treatment facilities at the Site.

The vision of this plan is to establish an integrated baseline for waste management at the Site. Ideally, the costs associated with waste disposal will be part of the project costs for such areas as residue stabilization, decommissioning, etc. The plan will identify and prioritize work and allow for effective resource allocation and funding justification. In addition, the plan will afford the opportunity to make informed, rational decisions regarding facility planning and utilization.

Waste Management Operations would appreciate the opportunity to meet with you and Tim Hedahl to provide a detailed briefing on the plan, its capabilities, and other aspects of storing the varied wastes generated at Rocky Flats. Graeme Rankin of my staff will be contacting Tim in the very near future to set a time and location for a briefing and feedback from you and your staff on modifications and changes.

If you have any questions regarding this correspondence, please contact Andy Power at extension 9874 or Alan Church at extension 7825 at your convenience.

Thank you

James L. McAnally

President

Rocky Mountain Remediation Services, L.L.C.

Attachment As Stated:

cc: w/o Atch

T. G. Hedahl - Kaiser-Hill R. N. Ogg - Kaiser-Hill G. M. Voorheis - Kaiser-Hill

J. G. McKibbin - Safe Sites Of Colorado

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